

MILMAN LABUDA LAW GROUP PLLC

3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

August 20, 2021

VIA ECF & E-MAIL

State of New York
Office of the Attorney General
Attn: Maryam Jazini Dorcheh, Esq.
28 Liberty Street
New York, NY 10005
maryam.jazini@ag.ny.gov

Attorneys for Defendants
Andrew M. Cuomo, and
Empire State Development Corp.

VIA ECF & E-MAIL

James E. Johnson
Corporation Counsel of the City of New York
Attn: Rachel K. Moston & Edward L. Murray, Esqs.
100 Church Street, Rooms 5-153 & 5-319, respectively
New York, NY 10007
rmoston@law.nyc.gov
emurray@law.nyc.gov

Attorneys for Defendant
Bill de Blasio

Re: Plaza Motors of Brooklyn, Inc., et al. v. Cuomo, et al.
Case No.: 1:20-cv-4851 (WFK) (SJB)
MLLG File No.: 215-2020

Counselors:

This firm represents the Plaintiffs in the above-referenced case. Plaintiffs write pursuant to ¶ III(G) of this Court's Individual Motion Practices and Rules to submit their memorandum of law in opposition to the Defendants' separate motions to dismiss pursuant to Rule 12(h)(3) of the Federal Rules of Civil Procedure.

Dated: Lake Success, New York
August 20, 2021

Regards,

MILMAN LABUDA LAW GROUP PLLC

/s

Jamie S. Felsen, Esq.
Emanuel Kataev, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 328-0082 (facsimile)
jamiefelsen@mllaborlaw.com
emanuel@mllaborlaw.com

Enclosures (via email only).

VIA ECF (without enclosures)

United States District Court
Eastern District of New York
Attn: Hon. William F. Kuntz II, U.S.D.J.
225 Cadman Plaza East
Courtroom 6H North
Brooklyn, NY 11201-1804